

Stuckel, Jonathan R.

From: Scheuerman, Christian M.
Sent: Friday, August 12, 2022 1:20 PM
To: Philip Stern
Cc: Mark Jensen; Yongmoon Kim; esellers@shb.com; klf; rschwartz@shb.com; Stuckel, Jonathan R.
Subject: RE: Levins v. HRRG

Hi Phil,

I am sorry, but we cannot consent to an extension. Our summary judgment motion and opposition to class certification were filed on 7-5-22, over a month ago. On July 7, in a Court filing you alleged that the SJ motion was somehow improper even though the Court had previously permitted it. The Court denied your request on 7-15. Then, on the same day, you requested that your opposition deadline to both motions be extended from July 19 to August 12 (almost one month), to which my office consented.

Next, on August 9, you argued to the Court for the first time that our SJ motion should be stayed, but for the standing issue. Notably, nowhere in the letter did you request a further extension of your opposition deadline. The Court denied your request on August 10. Then this morning, you essentially sought consent from Defendant for the same relief, to which we could not consent.

I am always willing to grant an extension. My record in this case and in [Morales](#) proves that. However, this course of conduct has now becoming prejudicial to my client. As a result, I cannot consent.

Regards,

Chris

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